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17 *Attorneys for Defendant Bristol-Myers Squibb Company*

18 [Additional Counsel Listed At Signature Page]

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA  
21 SAN FRANCISCO DIVISION

22 JAMES BLAIR *et al.*,

23 Plaintiff,

24 v.

25 BRISTOL-MYERS SQUIBB COMPANY,  
26 MCKESSON CORPORATION, and  
27 DOES 1 to 100,

28 Defendants.

No. 14-2515 EMC

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO STAY  
LITIGATION PENDING TRANSFER TO  
THE PLAVIX® MDL**

Judge: Hon. Edward M. Chen

1 This Joint Stipulation is made by and between Plaintiffs in *Blair et al. v. Bristol-Myers*  
2 *Squibb Co. et al.*, No. CV-14-2515 EMC (N.D. Cal.), and Defendant Bristol-Myers Squibb  
3 Company (“BMS”) (collectively “the Parties”), by and through the undersigned counsel of record,  
4 with reference to the following facts:

5 1. WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation  
6 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to  
7 Judge Freda Wolfson;

8 2. WHEREAS, on May 30, 2014, Plaintiffs filed the *Blair* action in the Superior Court  
9 of California, San Francisco County;

10 3. WHEREAS, on June 2, 2014, the *Blair* action was removed to this Court by  
11 Defendant BMS;

12 4. WHEREAS, on June 11, 2014, Defendant BMS tagged this case for transfer to the  
13 Plavix® MDL and anticipates that the JPML will issue a conditional transfer order for this case  
14 soon; and

15 5. WHEREAS, the parties agree that the *Blair* action should be stayed pending its  
16 anticipated transfer to the Plavix® MDL in the District of New Jersey.

17  
18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s  
19 approval, that the *Blair* action should be stayed pending its anticipated transfer to the Plavix® MDL  
20 in the District of New Jersey.

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22 **IT IS SO STIPULATED.**  
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1  
2 Dated: June 11, 2014

Joshua C. Ezrin  
AUDET & PARTNERS, LLP  
221 Main Street, Suite 1460  
San Francisco, CA 94105

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5 Daniel C. Burke  
6 PARKER WAICHMAN LLP  
7 6 Harbor Park Drive  
8 Port Washington, New York 11050

9 By: /s/ Joshua C. Ezrin  
Joshua C. Ezrin

10 *Attorney for Plaintiffs*

11  
12 Dated: June 11, 2014

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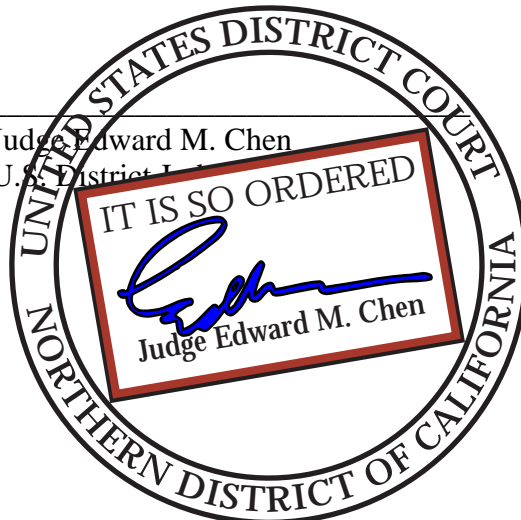
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15 By: /s/ Sharon D. Mayo  
Sharon D. Mayo

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17 *Attorney for Defendant*  
18 *Bristol-Myers Squibb Company*

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
20

21  
22 Date: 6/13/14

23 Judge Edward M. Chen  
24 U.S. District Judge



1 I, Sharon D. Mayo, am the ECF User whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order to Stay Litigation Pending Transfer to the Plavix® MDL. In  
3 compliance with General Order 45, X.B, I hereby attest that Joshua C. Ezrin has concurred in this  
4 filing.

5  
6 Dated: June 11, 2014

ARNOLD & PORTER LLP

7  
8 By: /s/ Sharon D. Mayo

9 Sharon D. Mayo

10 *Attorney for Defendant*  
11 *Bristol-Myers Squibb Company*  
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